

JONES DAY

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November 9, 2020

VIA FOIA ONLINE

Regional Freedom of Information Officer
U.S. EPA, Region 6
(6MD-OE)
1445 Ross Avenue
Dallas, TX 75202-2733
(214) 665-7202

Re: FOIA Request

Dear Sir or Madam:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552(c) for the below-described records maintained by the U.S. Environmental Protection Agency (“USEPA”) concerning the Star Lake Canal Superfund Site, TX0001414341, in and around the cities of Port Neches and Groves, Jefferson County, Texas (the “Star Lake Canal Site”).

The relevant time period for the following request is from December 2017 to the present. We request copies of:

- All communications between USEPA and any Star Lake Canal Site Potentially Responsible Party (“PRP”) or its counsel, relating to the absence, existence, or quality of evidence allegedly demonstrating the potential liability of any of the following entities for costs of Response (as that term is defined at 42 U.S.C. § 9601(25)) (“Response Costs”) at the Star Lake Canal Site, or otherwise discussing such evidence:
 - TOTAL Petrochemicals & Refining, USA, Inc. (“TPRI”)
 - BP America Inc.
 - BASF Total Petrochemicals, LLC.
- All documents relating to the potential liability of any of the above-listed entities for Response Costs at the Star Lake Canal Site.

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- All communications between USEPA and any Star Lake Canal Site PRP or its counsel concerning the Port Arthur Refinery located between 32nd Street and the Neches River in Port Arthur, Texas, including any communications concerning the potential or alleged contribution of hazardous materials by the Port Arthur Refinery to the Star Lake Canal site or any related Area of Interest.

Please be advised that Jones Day represents TPRI in connection with matters related to the Star Lake Canal Site. TPRI agrees to pay the fees incurred by the EPA associated with this request up to a maximum of \$1,000. If you estimate the fees will exceed this limit, please let me know so that we may discuss this with TPRI.

Should you have any questions, please do not hesitate to contact me by phone at (832) 239-3860 or by email at wrtaylor@jonesday.com. We appreciate your help in this matter.

Sincerely,

/s/ William R. Taylor

William R. Taylor